

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

IN RE:	)	
	)	
TONYA ANNE DARNELL	)	Case No. 17-35306-KRH
	)	Chapter 13
Debtor	)	

**MOTION FOR EXTENSION OF TIME FOR FILING CERTIFICATE  
OF COMPLETION OF POST-PETITION FINANCIAL MANAGEMENT  
COURSE AND CERTIFICATION PURSUANT TO 11 U.S.C. § 1328**

COMES NOW the Debtor, by counsel, and files this Motion to extend the time for the filing of the Certificate of Completion of Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328; and in support hereof states unto the Court as follows:

1. The Debtor filed the Chapter 13 petition herein on October 24, 2017.
2. The Debtor has completed the Chapter 13 Plan payments and on June 6, 2020 the Court issued a Notice to Debtor and Creditors Concerning Issuance of Discharge.
3. Counsel for the Debtor has had difficulty in contacting the Debtor to remind the Debtor of the requirement to complete the Post-Petition Financial Management Course and sign the Certification Pursuant to 11 U.S.C. § 1328.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order extending the time for the filing of the Debtor's Certificate of Completion of Post-Petition Financial

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
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Richmond, VA 23218  
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(804) 225-9598 (fax)  
[jkane@kaneandpapa.com](mailto:jkane@kaneandpapa.com)  
*Counsel for Debtor*

Management Course and Certification Pursuant to 11 U.S.C. § 1328, and for such other relief as the Court may deem appropriate.

Respectfully submitted,

TONYA ANNE DARNELL

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
P.O. Box 508  
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(804) 225-9500 (phone)  
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[jkane@kaneandpapa.com](mailto:jkane@kaneandpapa.com)  
*Counsel for Debtor*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 21, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and to all creditors and parties in interest on the attached mailing matrix.

/s/ James E. Kane  
James E. Kane

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
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TONYA ANNE DARNELL	)	Case No. 17-35306-KRH
	)	Chapter 13
Debtor	)	

**NOTICE OF MOTION**

The above Debtor has filed Motion to extend the time for the filing of her Certificate of Completion of Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire  
Kane & Papa, P.C.  
1313 East Cary Street  
Richmond, Virginia 23219

- Attend a hearing to be scheduled at a later date. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Respectfully submitted,

TONYA ANNE DARNELL

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
P.O. Box 508  
Richmond, VA 23218  
(804) 225-9500 (phone)  
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[jkane@kaneandpapa.com](mailto:jkane@kaneandpapa.com)  
*Counsel for Debtor*

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/s/ James E. Kane  
James E. Kane

Label Matrix for local noticing

United States Bankruptcy Court  
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AMCA

0422-3

701 East Broad Street

Attention: Bankruptcy

Case 17-35306-KRH

Richmond, VA 23219-1888

4 Westchester Plaza, Suite 110  
Elmsford, NY 10523-1615

Eastern District of Virginia

Richmond

Fri Dec 8 09:15:58 EST 2017

AmSher Collection Srv

Amy Baker

City of Richmond

4524 Southlake Parkway

9347 Count Christopher Drive

PO Box 26508

Suite 15

Mechanicsville, VA 23116-6528

Richmond, VA 23261-6508

Hoover, AL 35244-3271

City of Richmond City Hall

Credit Control Corp

(p)FORD MOTOR CREDIT COMPANY

Room 109 Delinquent Taxes

Po Box 120568

P O BOX 62180

900 East Broad Street

Newport News, VA 23612-0568

COLORADO SPRINGS CO 80962-2180

Richmond VA 23219-1907

Ford Motor Credit Company, LLC

Henrico Doctors Hospital

MCV Associated Physicians

c/o Randolph, Boyd, Cherry and Vaughan

1602 Skipwith Rd

P O Box 91747

13 East Main Street

Henrico, VA 23229-5298

Richmond, VA 23291-1747

Richmond, VA 23219-2109

MCV Hospitals

MCV Physicians

Northumberland County

P.O. Box 980462

PO Box 91747

P.O. Box 297

Richmond, VA 23298-0462

Richmond, VA 23291-9747

Heathsville, VA 22473-0297

Northumberland Treasurer

Randolph Boyd Cherry &amp; Vaughan

Southwest Credit Systems

72 Monument Place

14 East Main Street

4120 International Pkwy

Heathsville, VA 22473-3336

Richmond, VA 23219-2110

Ste 1100

Carrollton, TX 75007-1958

Sternrecsvcs

United Consumers

Verizon

415 N Edgeworth St Ste 210

14205 Telegraph Rd

Verizon Wireless Bankruptcy

Greensboro, NC 27401-2071

Woodbridge, VA 22192-4615

500 Tecnolgy Dr Ste 500

Weldon Springs, MO 63304-2225

Carl M. Bates

James E. Kane

Judy A. Robbins

P. O. Box 1819

Kane &amp; Papa, PC

Office of the U.S. Trustee - Region 4 -R

Richmond, VA 23218-1819

1313 East Cary Street

701 E. Broad Street, Suite 4304

P.O. Box 508

Richmond, VA 23219-1849

Richmond, VA 23218-0508

Tonya Anne Darnell

P.O. Box 262

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